

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

MANNCORP, INC., ET AL.,

Plaintiffs,

v.

LED ONE DISTRIBUTION, INC., ET AL.,

Defendants.

CIVIL ACTION NO.

2:15-CV-02486-GAM

**CERTIFICATION OF GREGORY L. KALLET, ESQUIRE, REGARDING
ATTORNEYS' FEES**

I, Gregory L. Kallet, Esquire, declare as follows:

1. I am an attorney for plaintiffs Manncorp, Inc., Mann Manufacturing Services, Inc. and SMT International, Inc. (collectively "Manncorp") in this action.
2. On December 7, 2015, Judge McHugh entered an Order granting a default judgment in favor of Manncorp and against defendant Jinlei "Penny" Tang (docket no. 40).
3. Pursuant to the Order, defendant Tang is required reimburse Manncorp for the attorneys' fees and costs incurred by Manncorp in bringing this action.
4. As required by the Order, a detailed itemization of the attorneys' fees and costs incurred by Manncorp in bringing this action, including all applicable credits, totaling \$32,120.99, is attached as Exhibit "A".

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2015



Gregory L. Kallet

EXHIBIT “A”

Manncorp, Inc.
1610 Republic Road
Huntingdon Valley PA 19006

Page: 1
06/18/2015

Invoice No: 53933

Attn: Mr. Henry Mann

LED ONE

			<u>Fees</u>		
			Rate	Hours	
05/01/2015	GK	Meet with Lane to discuss case background; Review correspondence, employment agreements, company and website info; Prepare facts section for complaint.	350.00	3.70	1,295.00
05/03/2015	GK	Continue preparing fact section for complaint.	350.00	2.80	980.00
05/04/2015	PV	Telephone call and emails with It's Done courier re: service in CA; Draft CIS, designation form, case management form and summons.	350.00	1.00	350.00
	GK	Continue drafting complaint and associated filings; Telephone with Henry Mann, Tom Beck and Ivan Levensen re: same.	350.00	10.30	3,605.00
	JD	Attention to complaint.	405.00	1.80	729.00
05/05/2015	GK	Prepare complaint and exhibits for filing and service; Telephone and correspondence with process server re: same; Prepare facts section and affidavit for preliminary injunction motion; Correspondence and telephone with Henry Mann; Legal research for preliminary injunction motion; Draft motion.	350.00	7.40	2,590.00
	JD	Attention to complaint.	405.00	1.40	567.00
05/06/2015	JZ	Revise injunction brief.	425.00	0.50	212.50
	GK	Telephone calls with Henry Mann and Ivan Levensen; Revise Mann affidavit; Legal research for purposes of preliminary injunction motion; Draft memo of law in support of preliminary injunction motion.	350.00	10.50	3,675.00
05/07/2015	JZ	Revise TRO and preliminary injunction motion and brief.	425.00	2.00	850.00
	GK	Continue preparing motion for TRO and preliminary injunction, memo; Telephone calls and emails with Henry Mann; Filed and served motion and related filings.	350.00	8.10	2,835.00
05/08/2015	GK	Telephone with Penny Tang; Telephone calls with Court; Prepare for TRO conference with Judge McHugh; Telephone conference with Judge McHugh and all parties; Research procedure for posting bond.	350.00	2.70	945.00
05/11/2015	GK	Telephone calls with Henry Mann; Review and serve Temporary Restraining Order; Conference with Lane re: questions for penny and affidavit; Telephone conference with Penny and Trevor; Prepare memorandum re: same.	350.00	1.80	630.00
05/12/2015	GK	Email to Jeff Mann; Legal research re: duty of loyalty in employment context and damage; Telephone call with Trevor McCoy.	350.00	0.60	210.00

Manncorp, Inc.

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Invoice No:

53933

LED ONE

			Rate	Hours	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/22/2015	GK	[REDACTED] Review order from Judge McHugh re: extension and TRO; Telephone call with Henry Mann; Legal research re: default judgment against Penny and Trevor.	350.00	1.0	350.00
05/26/2015	GK	[REDACTED] Telephone with Henry Mann re: case status, settlement, default against Penny and Trevor; Legal research re: procedure for default judgment.	350.00	0.5	175.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
For Current Services Rendered				56.10	19,998.50
<u>Expenses</u>					
05/04/2015		Filing Fee: Clerk, US District Court			400.00
05/11/2015		Search Fees: Corsearch - Invoice # 13742797-CI			743.00
05/11/2015		Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 3543			292.50
[REDACTED]		[REDACTED]			[REDACTED]
05/13/2015		Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1505034978			150.43
[REDACTED]		[REDACTED]			[REDACTED]
05/20/2015		Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1505068740			34.26
[REDACTED]		[REDACTED]			[REDACTED]
Total Expenses					1,620.19
Total Current Work					[REDACTED]
					\$21,618.69
[REDACTED]					[REDACTED]

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

LED ONE

A finance charge of 1.5% per month will be assessed on all accounts past due 30 days.

Invoice No:

54951

LED ONE

Rate	Hours
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[REDACTED]	()	[REDACTED] [REDACTED] [REDACTED]			
	()	[REDACTED]	()	()	()
[REDACTED]	()	[REDACTED] [REDACTED]	()	()	()
[REDACTED]	()	[REDACTED]	()	()	()
[REDACTED]	()	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	()	()	()
[REDACTED]	()	[REDACTED] [REDACTED]	()	()	()
		<i>Minus Courtesy Credit per JZ</i>		-2,811.19	[REDACTED] [REDACTED]

06/30/2015

Search Fees: Thomson Reuters - West - Invoice # 832074983

2,285.90

Total Expenses

2,285.90

Total Current Work

\$2,285.90

114

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

A finance charge of 1.5% per month will be assessed on all accounts past due 30 days.

Manncorp, Inc.
1610 Republic Road
Huntingdon Valley PA 19006

Page: 1
09/29/2015

Invoice No: 55375

Attn: Mr. Henry Mann

LED ONE

[REDACTED]

[REDACTED] charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Invoice No: 55908

LED ONE

Rate	Hours
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			Rate	Hours	
(b) (6)	(b) (7)(C)	[REDACTED]	(b) (6)	(b) (7)(C)	(b) (6)
(b) (6)	(b) (7)(C)	[REDACTED]	(b) (6)	(b) (7)(C)	(b) (6)
(b) (6)	(b) (7)(C)	[REDACTED]	(b) (6)	(b) (7)(C)	(b) (6)
(b) (6)	(b) (7)(C)	[REDACTED]	(b) (6)	(b) (7)(C)	(b) (6)

07/07/2015	Online Legal Research: Pacer Service Center - Invoice #2586723-Q22015	13.80
	Total Expenses	13.80
	Total Current Work	
		\$13.80

A finance charge of 1.5% per month will be assessed on all accounts past due 30 days.

Manncorp, Inc.
 1610 Republic Road
 Huntingdon Valley PA 19006

Page: 1
 11/12/2015

Invoice No: 56532

Attn: Mr. Henry Mann

LED ONE

Fees

Rate

Hours

Expenses

10/01/2015

Online Legal Research: Thomson Reuters - West - Invoice # 832628317

2,004.46

Total Expenses

2,004.46

Total Current Work

\$2,004.46

A finance charge of 1.5% per month will be assessed
 on all accounts past due 30 days.

Manncorp, Inc.
1610 Republic Road
Huntingdon Valley PA 19006

Page: 1
12/10/2015
Invoice No: 56845

Attn: Mr. Henry Mann

LED ONE

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Total Amount of Fees, Including Credits: \$15,383.66

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Manncorp, Inc.
1610 Republic Road
Huntingdon Valley PA 19006

Attn: Mr. Henry Mann

Page: 1
07/16/2015

Invoice No: 54444

Tang

Fees

			Rate	Hours	
06/25/2015	GK	Telephone with Henry re: case status and settlement; Legal research re: motion for default judgment; Prepare motion for default judgment, permanent injunction and attorney fees; Attention to memorandum of law.	350.00	6.50	2,275.00
06/26/2015	GK	Legal research re: standard for entry of default judgment; Legal research re: method of proving damages without assessment of damages hearing; Prepared facts section of memo.	350.00	5.90	2,065.00
		For Current Services Rendered		12.40	4,340.00

Expenses

06/01/2015	Online Legal Research: Thomson Reuters - West - Invoice # 831899091	2,835.16
	Total Expenses	2,835.16
	Total Current Work	\$7,175.16

A finance charge of 1.5% per month will be assessed on all accounts past due 30 days.

Manncorp, Inc.
1610 Republic Road
Huntingdon Valley PA 19006

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08/18/2015

Invoice No:

54950

Attn: Mr. Henry Mann

Tang

			<u>Fees</u>		
			Rate	Hours	
07/01/2015	GK	Conference; Continue legal research re: permanent injunction motion.	350.00	0.50	175.00
07/08/2015	GK	Prepare permanent injunction motion; Finalize draft of default judgment and permanent injunction motion; Legal research re: recovery of attorney fees under the PA Uniform Trade Secret Act.	350.00	5.20	1,820.00
07/09/2015	GK	Emails to Ivan Levenson re: damages information in support of default judgment motion.	350.00	0.20	70.00
07/13/2015	GK	Prepare default judgment memo section re: damages.	350.00	1.60	560.00
07/15/2015	GK	Finalized default motion; Prepared Henry Mann certification and exhibits; Telephone calls with Henry and Loren McDonald re: same; Legal research re: extending TRO.	350.00	5.90	2,065.00
07/16/2015	GK	Finalize and file Penny default motion and supporting documentation; Telephone calls with Henry Mann re: same; PRepare letter motion to Judge McHugh re: extension of TRO; Telephone calls with Court and LED One counsel.	350.00	3.90	1,365.00
07/17/2015	GK	Review order extending TRO.	350.00	0.10	35.00
07/30/2015	GK	Letter to Judge McHugh re: default judgment motion and extension of TRO.	350.00	0.80	280.00
07/31/2015	GK	Review order extending TRO; Serve on Tang.	350.00	0.10	35.00
		For Current Services Rendered		18.30	6,405.00
		Minus Courtesy Credit per JZ		-1,153.27	
		Total Current Work		\$5,251.73	

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Manncorp, Inc.
 1610 Republic Road
 Huntingdon Valley PA 19006

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 09/29/2015

Invoice No: 55373

Attn: Mr. Henry Mann

Tang

09/23/2015	Courtesy Credit per Joe Dunn	-1,975.00	
<u>Expenses</u>			
08/01/2015	Online Legal Research: Thomson Reuters - West - Invoice # 832259825		626.75
	Total Expenses		626.75
	Total Current Work		\$626.75

A finance charge of 1.5% per month will be assessed
 on all accounts past due 30 days.

Manncorp, Inc.
1610 Republic Road
Huntingdon Valley PA 19006

Page: 1

10/29/2015

Invoice No:

55906

Attn: Mr. Henry Mann

Tang

Fees

			Rate	Hours	
09/08/2015	GK	Telephone calls with Judge McHugh's law clerk re: service of default motion on Tang; Telephone calls and emails with Loren McDonald re: Tang's whereabouts and contact information; Telephone calls and emails with Trevor McCoy re: same; Legal research re: service of motion in foreign countries.	350.00	1.10	385.00
09/09/2015	GK	Telephone with Judge McHugh's law clerk re: service and notice to Tang.	350.00	0.20	70.00
09/10/2015	GK	Research re: Tang address in China and other contact information.	350.00	0.20	70.00
09/11/2015	GK	Served default judgment notice on Penny in China; Served via email using tracking program; Legal research re: adequate notice of default motion on defendant.	350.00	1.50	525.00
09/14/2015	GK	Analysis re: Penny's receipt of default package in China for purposes of preparing supplemental brief and affidavit in support of default motion.	350.00	0.40	140.00
09/17/2015	GK	Legal research for purposes of preparing supplemental brief in support of default motion; Drafted supplemental brief in support of default motion against Tang.	350.00	3.80	1,330.00
09/18/2015	GK	Finished draft of supplemental brief in support of default motion and GLK certification; Prepare exhibits; Legal research re: service by email.	350.00	6.10	2,135.00
09/22/2015	GK	Review rule to show cause re: default motion; Serve on Tang;	350.00	0.20	70.00
		For Current Services Rendered		13.50	4,725.00

Expenses

09/01/2015	Online Legal Research: Thomson Reuters - West - Invoice # 832449776	219.78
09/23/2015	Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1509102722	60.13
09/30/2015	Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1509137086	128.78
	Total Expenses	408.69

Manncorp, Inc.

10/29/2015

Invoice No:

55906

Tang

Total Current Work

\$5,133.69

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Manncorp, Inc.
 1610 Republic Road
 Huntingdon Valley PA 19006

Page: 1

11/12/2015

Invoice No:

56530

Attn: Mr. Henry Mann

Tang

		<u>Fees</u>			
			Rate	Hours	
10/14/2015	GK	Review court notification re: service of rule to show cause; Communications with Judge McHugh's law clerk re: same.	350.00	0.30	105.00
10/19/2015	GK	Prepare and file supplemental certification of GLK regarding service of rule to show cause on Tang, at court's discretion.	350.00	1.20	420.00
		For Current Services Rendered		1.20	525.00
		Total Current Work			\$525.00

A finance charge of 1.5% per month will be assessed
 on all accounts past due 30 days.

Manncorp, Inc.
1610 Republic Road
Huntingdon Valley PA 19006

Page: 1
12/10/2015

Invoice No: 56843

Attn: Mr. Henry Mann

Tang

		<u>Fees</u>			
			Rate	Hours	

Total Amount of Fees, Including Credits: \$16,737.33

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.